

October 3, 2022

The Honorable Judge Taryn A. Merkl
U.S. District Court - Eastern District of New York
225 Cadman Plaza E, Brooklyn, NY 11201

Re: *In re Application of Forensic News LLC & Scott Stedman*, 22-mc-1617-MBK-TAM

Dear Judge Merkl:

We write as counsel to Petitioners in the above-captioned Section 1782 proceeding. On September 22, 2022, we filed a letter pursuant to this Court's Individual Rule 3(A) requesting an informal discovery conference pertaining to the deposition of Respondent Aviram Azari, which this Court authorized on August 16, 2022. *See* Dkt. 14. Since we filed that letter, we have continued to work with Mr. Azari's counsel, Barry Zone, to resolve the parties' disputes. Mr. Zone has now committed to provide us with a date for and to appear at Mr. Azari's deposition. Contingent on that commitment, Petitioners tentatively withdraw their request for a discovery conference and for costs and fees. Petitioners reserve the right to reinstate their request.

Respectfully submitted,

/s/ Anne Champion

Anne Champion

cc: All Counsel of Record (via ECF)